REMARKS

Reconsideration of this application, in view of the foregoing amendment and the following remarks, is respectfully requested.

Claims 1-48 were originally presented for consideration in this application. Claims 12, 20, 21, 28, 33, 40, 44 and 46-48 have been canceled. Claims 49-56 have been added above. Accordingly, claims 1-11, 13-19, 22-27, 29-32, 34-39, 41-43, 45 and 49-56 are currently pending in this application.

The examiner's indications that claims 22-27, 29-39 and 36-39 are allowed, and that claims 4-10, 12, 13, 20, 21, 34, 35, 44 and 45 contain allowable subject matter, are noted with appreciation. Of these, claims 34 and 35 have been rewritten in independent form above. In addition, the limitations of indicated allowable claims 12 and 44 have been incorporated into their respective independent claims 11 and 41. New claims 49-56 are the result of incorporating the limitations of indicated allowable claim 13 into independent claim 12, along with the remaining dependent claims, rewritten as a new claim set. Therefore, it may be seen that claims 34, 35, 11, 41, 49 and their dependents are now in condition for allowance.

The only remaining issue after these amendments is the rejection of claims 1-3 as being anticipated by Hickey (US 6266465). Please note that independent claim 1 recites that a wellbore junction system includes a wellbore junction, with a casing string connected to the wellbore junction, and with the wellbore junction having a pressure rating of at least 50% of a pressure rating of the casing string.

In contrast, Hickey describes a fiber optic conduit junction, which is not a wellbore junction. In addition, the fiber optic conduit junction is not described by Hickey as being connected to a casing string. Furthermore, there is no description in

PATENT

Attorney Docket No.: 2002-IP-006716 U1 USA

Hickey of the fiber optic conduit junction having a pressure rating of at least 50% of a pressure rating of any casing string. This last limitation is asserted in the Office Action as being disclosed at column 3, lines 13-15 of Hickey, but this portion of the Hickey reference actually relates to a pressure rating of <u>seals</u> used between fiber optic conduit sections.

Therefore, for at least the three reasons discussed above, Hickey does not anticipate claim 1 or its dependents. Accordingly, withdrawal of these rejections is respectfully requested.

In view of the foregoing amendment and remarks, all of the claims pending in this application are now seen to be in a condition for allowance. A Notice of Allowance of claims 1-11, 13-19, 22-27, 29-32, 34-39, 41-43, 45 and 49-56 is therefore earnestly solicited.

The examiner is hereby requested to telephone the undersigned attorney of record at (972) 516-0030 if such would expedite the prosecution of the application.

Respectfully submitted,

SMITH IP SERVICES, P.C.

Marlin R. Smith Attorney for Applicant Registration No. 38.310

Dated: February 5, 2007

660 North Central Expressway Suite 230 Plano, Texas 75074 (972) 516-0030 I hereby certify that this document and any attachments and enclosures are being filed electronically via EFS-Web on February 5, 2007,